

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

KIMBERLEE VEN HOUSEN

Plaintiff,

Case No.: 20-CV-1097

v.

RV WORLD, INC OF NOKOMIS d/b/a
GERZENY'S RV WORLD,
WINNEBAGO INDUSTRIES, INC. and
MERCEDES-BENZ USA, LLC,

Defendants.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY

Plaintiff,

Case No.: 20-CV-1099

v.

WINNEBAGO INDUSTRIES, INC. and
MERCEDES-BENZ USA, LLC,

Defendants.

**DECLARATION OF NATHANIEL CADE, JR. IN SUPPORT OF
DEFENDANT WINNEBAGO INDUSTRIES, INC.'S MOTION TO CONSOLIDATE**

Pursuant to 28 U.S.C. § 1746, the undersigned, Nathaniel Cade, Jr., makes the following statements under penalty of perjury under the laws of the United States.

1. This Declaration is made in Support of Defendant Winnebago Industries, Inc.'s Motion to Consolidate E.D. Wisconsin Case #20-CV-1097 and E.D. Wisconsin Case #20-CV-1099.

2. Plaintiffs Kimberlee Ven Housen ("Ven Housen") filed a lawsuit on June 12,

2020 in the Walworth County Circuit Court styled "*Ven Housen v. RV World, Inc of Nokomis d/b/a Gerzeney's RV World et al.*", Case # 2020-CV-0307 (the "Ven Housen Lawsuit"). The Ven Housen Lawsuit was removed to this Court on July 18, 2020.

3. Plaintiff State Farm Mutual Automobile Insurance Company ("State Farm") filed a lawsuit on June 16, 2020 in the Walworth County Circuit Court, *State Farm Mutual Automobile Insurance Company et al v. Winnebago Industries, Inc. et al.*, Walworth County Case # 2020-CV-03127 (the "State Farm Lawsuit"). The State Farm Lawsuit was removed to this Court on July 19, 2020.

4. In both lawsuits, Ven Housen and State Farm seek damages against Winnebago Industries, Inc and Mercedes-Benz USA, LLC, as well as damages against Defendant RV World, Inc. in the Ven Housen Lawsuit, with regards to fire damage to an allegedly defective Winnebago van, as well as damages to Ms. Ven Housen's home.

5. I am aware that defendants Mercedes-Benz USA, LLC and RV World, Inc. both consent to consolidation of these two cases.

Executed this 23rd day of July, 2020.

/s/Nathaniel Cade, Jr.
Nathaniel Cade, Jr.

